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January 26, 2024

The Honorable Tonianne J. Bongiovanni, United States Magistrate Judge  
United States District Court for the District of New Jersey  
Clarkson S. Fisher Federal Building and United States Courthouse  
402 East State Street, Trenton, NJ 08608

Re: Kumar, et.al. v. *Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., et al.*,  
No. 21-CV-11048 (GC)(TJB)

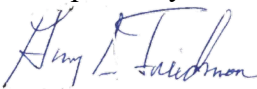
Dear Judge Bongiovanni:

We represent Defendants Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha, Inc., BAPS Atlanta, LLC, BAPS Chicago, LLC, BAPS Chino Hills, LLC, BAPS Houston, LLC, BAPS Mercer, LLC, BAPS Robbinsville, LLC, BAPS Development, Inc., BAPS Fellowship Services, Inc., Bharat Patel, a/k/a Bharat Doe a/k/a Bharat Bhai, Kanu Patel, Pankaj Patel, Swami Prasanand a/k/a Prashant Darshan Das Sadhu, and Rakesh Patel in the above-referenced civil action.<sup>1</sup> We write jointly with counsel for Plaintiffs to provide the Court with an update as directed in the Court's December 1, 2023 text Order.

The government's investigation is ongoing, and they have not given counsel in the above-referenced matter any timeframe as to when they expect the investigation to conclude. Because the investigation is ongoing, Defendants' position is that the Trafficking Victims Protection Act, 18 U.S.C. § 1595(b), requires that the stay—entered by the Court on the parties' consent in November 2021—remain in effect pending the conclusion of the government investigation. When the government informs the parties that the investigation has concluded, the counsel for the parties will promptly notify the Court.

We thank the Court for its attention to this matter.

Respectfully submitted,



Gary D. Friedman

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<sup>1</sup> We do not represent defendants BAPS Bochasanwasi Shri Akshar Purushottam Swaminarayan Sanstha (an India Public Trust) or Harshad Chavda.